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Accepted / Filed

VIA HAND DELIVERY

Ms. Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington DC 20554

AUG 31 2016

Federal Communications Commission
Office of the Secretary

Attn: Evan S. Morris
Video Division
Media Bureau

Re: KCPM(TV), Grand Forks, ND
Facility ID No. 86208
File No. BRC DT-20140401ADQ

Dear Sir/Madam:

G.I.G of North Dakota LLC ("G.I.G."), licensee of KCPM(TV), Grand Forks, North Dakota (the "Station"), submits its response to the June 17, 2016 letter signed by Deputy Chief, Video Division, Media Bureau. The letter provides, *inter alia*, the following:

"In order to determine whether the Station has met its obligations under Section 309(k) of the Communications Act of 1934, as amended, G.I.G. must answer the following questions and provide the following information including uploading all missing documents to its e-pif to the extent requested below."

The questions contained in the letter have been reposted below and after each one is G.I.G.'s answer.

Question 1

- 1) Please place in the Station's e-pif and as necessary file with the Commission all public file documents required under Section 73.3526 of the Rules. Such documents should include, but are not limited to, the Station's quarterly TV issues/programs lists, quarterly Children's Television Programming Reports, and quarterly documentation demonstrating compliance with the Commission's commercial limit rules (commonly referred to as Commercial Limit Certifications). The Station's public file documents should cover the entire preceding license term, which for purposes of our investigation remains open and commenced on July 16, 2007, the date of grant of the Station's original license to cover.

Answer to Question 1

Attached to the instant response is a list of the public file documents contained in the station's e-pif (Attachment A). Those documents required under Section 73.3526 which are not in the e-pif shall be uploaded and the Commission so notified.

It should be noted that the Station's quarterly issues/programs lists were not timely prepared. Programming was done by means of PSA's and other programming to address the issues. The issues/programs lists are being reconstructed. Once completed they will be placed in the e-pif and the Commission so informed.

Question 2

- 2) Please identify each document that was not prepared, placed, and/or filed as required by Section 73.3526. G.I.G. should make note of any documents that may have been prepared in a timely manner, but were only placed in the Station's physical local public inspection file. G.I.G. should also provide a detailed explanation as to why required public file documents were not prepared, placed and/or filed as required by Section 73.3526 of the Rules. If the Licensee failed to prepare any required public file documents the Licensee should accurately recreate those documents from its records. If a document cannot be recreated the Licensee should note the reason in its response.

Answer to Question 2

As previously mentioned, the issues/programs lists were not prepared and filed. The children's programming reports and commercial limit certifications were prepared but only placed in the physical local public inspection file. They have been subsequently uploaded to the e-pif.

PSA's were broadcast to address the quarterly issues. The drafting of the report was not done due to limited resources. In this regard, the Station is struggling financially and was unable to devote the manpower necessary to prepare the required reports. The reports are being reconstructed.

Question 3

- 3) Please provide a comprehensive list of any documents that are required under Section 73.3526 of the Rules to be prepared, placed, and/or filed, but are not applicable to the Station and therefore not in the Station's e-pif. For example, if G.I.G. is not a party to a Joint Sales Agreement it need not place a copy of such an agreement into the Station's public file.

Answer to Question 3

Section 73.3526 of the Commission's rules provides in pertinent part that the following documents be maintained in a station's public inspection file:

- (a) FCC Authorization – This is in the public file.
- (b) Applications – The pending renewal application and STA request are in the public file.
- (c) Citizen Agreements – N/A
- (d) Ownership Reports – On file.
- (e) Contour Maps – On file.
- (f) Political File – On file.
- (g) Equal Employment Opportunity File – Note: Station employs less than five (5) full-time employees.
- (h) The Public and Broadcasting – On file.
- (i) Letters and Email from the Public – N/A
- (j) Material Relating to FCC Investigation or Complaint – The Commission's June 17, 2016 letter is contained in the Station's public file.
- (k) Standardized Television Disclosure Form – To be filed.
- (l) Records Concerning Commercial Limits – On file.
- (m) DTV Transition Education Reports – N/A
- (n) Local Public Notice Announcements – On file.
- (o) Radio and Television Time Brokerage Agreements – N/A
- (p) Must-Carry or Retransmission Consent Election – Retransmission Agreement in file.

- (q) Radio and Television Joint Sales Agreements – N/A
- (r) Class A TV Continuing Eligibility – N/A
- (s) TV Standardized Public Interest Reporting Form – N/A

Question 4

- 4) Please explain why the Station's license renewal application was not filed until April 1, 2014, four months after the filing deadline.

Answer to Question 4

The delay in the filing of the station's renewal was occasioned by the following:

- (a) Charles Poppen, the manager and sole member of G.I.G. has had significant health issues. These issues prevented Mr. Poppen from focusing on the preparation and filing of the renewal; and
- (b) In addition, G.I.G., due to its poor financial health, was unable to retain professional assistance to aid it in completing the renewal.

When Mr. Poppen was well enough to focus on the station's renewal, it was past the time of the renewal application filing deadline. However, in spite of all efforts, the renewal application was unable to be filed until a few hours after the renewal had expired.

Question 5

5) In response to Question 7 of each of the Station's 2013 Children's Television

Programming Reports, G.I.G. states that the Station aired an average of five (5) hours per week of children's programming over the course of each quarter. A staff review of the programs listed in each report revealed that based on the total number of programs aired the average listed may be incorrect. Please review these reports for accuracy, confirm how the reports are accurate giving the specific steps used to determine accuracy, and as necessary amend the reports.

Answer to Question 5

Upon review of the Station's 2013 Children's Television Programming Reports, G.I.G. discovered that it did make a computational error. Over the course of each quarter it aired on average 3.5 hours per week of core programming. All the reports are being examined and to the extent necessary will be amended.

Question 6

- 6) Review the Station's e-pif and the Commission's Licensing Management System (LMS) to ensure that all required information, including contact information is provided and accurate. In particular, the Licensee must provide the Station's main studio address on the main page of its e-pif and in LMS. The Licensee must also list a closed captioning contact on the main page of its e-pif.

Answer to Question 6

The information regarding the Station's main studio address has been provided on the main page of the e-pif and in LMS. In addition, the closed captioning contact has been listed on the main page of its e-pif.

Question 7

- 7) Disclose any other violations of Commission rules or the Act that have not been addressed by the inquiries in this letter and should be disclosed as part of the Station's license renewal application.

Answer to Question 7

G.I.G. is not aware of any other violations which would be required to be disclosed as part of the Station's license renewal application. However, should it discover any violations, it will amend the pending renewal.

Question 8

- 8) Along with the Station's written response, please include a declaration by an individual(s) with personal knowledge of the facts and signed under penalty of perjury that the facts and information provided in response to the questions herein are both true and correct.

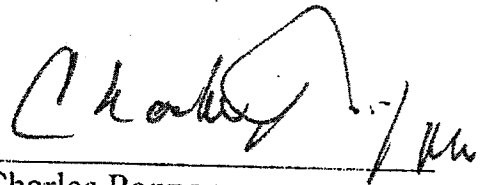
Answer to Question 8

See attached Declaration of Charles Poppen.

DECLARATION OF CHARLES POPPEN

Charles Poppen hereby states under penalty of perjury the following:

I have reviewed the attached responses to the June 17, 2016 letter and hereby state that the facts and information provided to the questions are true and correct.

A handwritten signature in black ink, appearing to read 'Charles Poppen', with a stylized flourish at the end.

Charles Poppen
Sole Member
G.I.G. of North Dakota, LLC

August 31, 2016

Attachment A

Children's Programming Reports

2016:	Quarters 1 & 2
2015:	Quarters 1, 2, 3, & 4
2014:	Quarters 1, 2, 3, & 4
2013:	Quarters 1, 2, 3, & 4
2012:	Quarters 1, 2, 3, & 4
2011:	Quarters 1, 2, 3, & 4
2010:	Quarters 1, 2, 3, & 4
2009:	Quarters 1, 2, 3, & 4
2008:	Quarters 1, 2, 3, & 4
2007:	Quarters 1, 2, 3, & 4

Commercial Limits Certification

2016:	Quarters 1 & 2
2015:	Quarters 1, 2, 3, & 4
2014:	Quarters 1, 2, 3, & 4
2013:	Quarters 1, 2, 3, & 4
2012:	Quarters 1, 2, 3, & 4
2011:	Quarters 1, 2, 3, & 4
2010:	Quarters 1, 2, 3, & 4
2009:	Quarters 1, 2, 3, & 4
2008:	Quarters 1, 2, 3, & 4
2007:	Quarters 1, 2, 3, & 4

Issues & Program Lists

2016: 2nd Quarter

Other Documentation

Main Studio Location & Contact Person
Closed Caption Contact Person
The Public & Broadcasting